

UNITED STATES DISTRICT COURT

United States Courts
Southern District of Texas
FILED

for the

Southern District of Texas

JAN 14 2022

Houston Division

Nathan Ochsner, Clerk of Court

Ephesian Johnny Franklin

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Case No. _____

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☒ NoBeyonce Giselle Knowles

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Ephesian Johnny Franklin

Street Address

1109 Wilson

City and County

Houston, TX 77019, Harris County

State and Zip Code

Texas. 77019

Telephone Number

832-

E-mail Address

milli7ephesus@gmail.com

B. The Defendant(s)

Mailing Address 211 North Woodson
Willis, Texas, 77378

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Beyonce Giselle Knowles
Singer

Defendant No. 2

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 3

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 4

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Defamation, Pain and Suffering, Unlawful authoriti

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* _____, is a citizen of the
State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

My house, cars, grandmother house, and all assets are in Beyonce Giselle Knowles music video without my consent. She keep violating me and doing financial damages with recent social stints. She harass me with defamacion.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I would need to be relieved with \$77,000,000 dollars for family damages, home, cars, books, and Bible damages, and music video "no angel".

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: January 14, 2022

Signature of Plaintiff

Printed Name of Plaintiff

Ephesian Johnny Franklin
Ephesian Johnny Franklin

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Epheson Franklin
211 N Woodson
Billis, TX 77378

United States Court
Southern District of Texas

JAN 4 1

Nathan Ochsner, Clerk of Court

United States District
Southern District of
Post Office Box 61
Houston, TX 77208

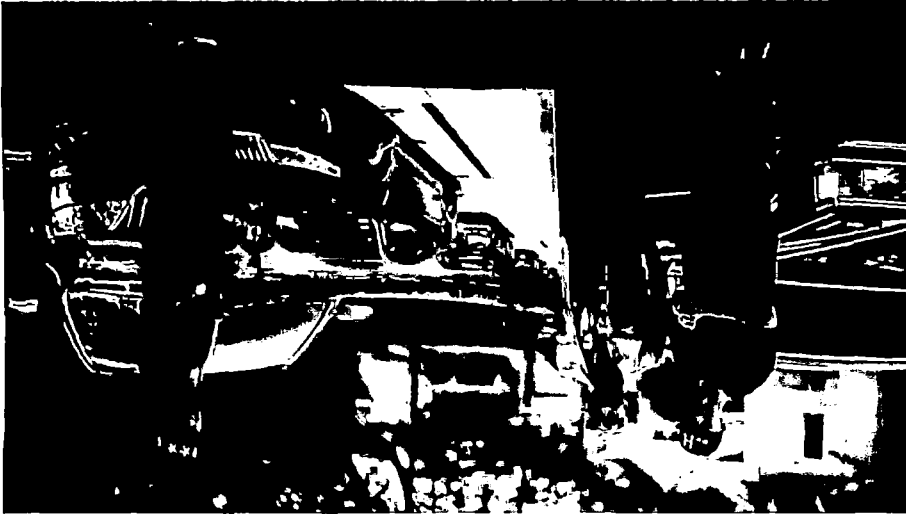


Beyoncé - No Angel (Video)



17M views

Beyoncé - No Angel (Video)





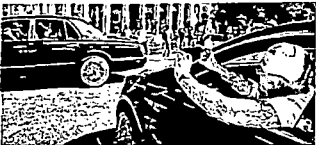
Beyoncé - No Angel (Video)



BeyoncéVEVO 16,442,625 views



1263 likes
hogglife101 #slabparade creator
@4thwardredkingfish
view all 19 comments
therealest_08 @nashira12 Lmao yea I was
talking bout slim



Beyonce: No Angel on Vimeo

Vimeo › BONFIRE › Videos



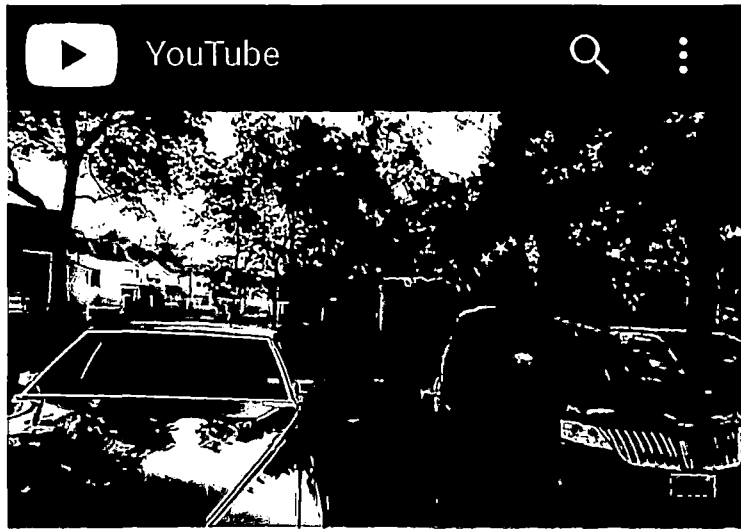
UPLOADED BY:
BONFIRE

POSTED:
Feb 14, 2019

No Angel by Beyoncé - Songfacts

Songfacts › facts › beyonce › no-angel

No Angel by Beyoncé song meaning, lyric interpretation, video and chart position.



Beyoncé - No Angel (Video)

17,172,742 views



Music video beyonce mv G...
gifer.com

Beyonce No Angel Music
pinterest.com



You can buy the house use...
entertainment.ie



UKMIX Forums
ukmix.org



Beyonce No Angel - Video ...
wopvideos.com



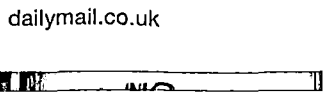
Columbia |
asdasdlkj.thecinemart.com



No Angel video clip sells ...
dailymail.co.uk



Beyonce No ANGEL (Bey-c...
youtube.com





Beyoncé's 'Flawless': The ...
theatlantic.com



Beyoncé Models Plus Size ...
therecessionista.com



Beyonce - No Angel (Officia...
myvideo.az




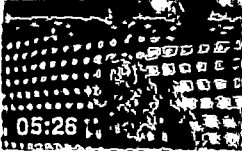



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crazy in love with Beyonce ...
beyonce.trendolizer.com



JAY-Z's Marriage After Che...

	Ngozi Adichie - Flawless 3 months ago 730,649 views
	Beyoncé - Haunted (Music Video) James W 2 months ago 11,625 views
	Beyonce - Jealous (Official Video) [HD 720p] Henrietta-Aime-Fumer_Tv 3 months ago 357,850 views
	Beyoncé (19) Blow (Video) HQ Eurovision Memories Greece 3 months ago 116,598 views
	Beyoncé (20) No Angel (Video) HQ Eurovision Memories Greece 3 months ago 40,134 views